



CORNERSTONE

Environmental Group, LLC

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VIA E-MAIL AND US MAIL

October 4, 2012

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: Monthly Progress Report for September 2012
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

1. Previous Actions in Compliance with the Order

A. The following actions have been taken to comply with the Order during the previous month:

- Met with representatives of the USEPA and the NJDEP, on September 11, 2012, to discuss the status of and comments on the *Draft Remedial Investigation Report* and the *Draft Feasibility Study*.
- Following the September 11 meeting continued coordination with the USEPA on resolving comments on the *Draft Remedial Investigation Report* and the *Draft Feasibility Study*.
- Continued coordination with Praxair regarding access to the LCP site for utility markout and survey, for replacement of the nitrogen line.

B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated September 7, 2012, including an updated project schedule dated August 29, 2012.

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C. The following agency approvals were received during the previous month:

- None during the reporting period.

D. The following agency documents and correspondences were received during the previous month:

- None during the reporting period.

E. Other pertinent communications with the agencies during the previous month:

- Electronic mail message from Jonathan Gorin of the USEPA to David McNichol and Carrie McGowan of IES, dated September 12, 2012, summarizing the discussions and actions items from the September 11, 2012 meeting.
- Electronic mail message from David McNichol of IES to Jonathan Gorin of the USEPA, dated September 14, 2012, providing the presentation files from the September 11, 2012 meeting.
- Electronic mail message from Jonathan Gorin of the USEPA to David McNichol and Carrie McGowan of IES, dated September 27, 2012, transmitting additional comments from the USEPA ERRD on the "Draft Feasibility Study modifications" (i.e., text and tables prepared regarding COPCs, PRGs, and PTW) and the "Draft Remedial Investigation Report (modified)" to incorporate the investigation of the off-site ditches.

2. Future Actions, Data, and Plans

A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months contingent on the USEPA's schedule for resolving comments on previously submitted documents:

- Continue work on resolving comments from the USEPA on the *Draft Remedial Investigation Report* submitted by IES.
- Continue work on resolving comments from the USEPA on the *Draft Baseline Ecological Risk Assessment* submitted by IES.
- Continue work on resolving comments from the USEPA on the revised *Draft Remedial Investigation Report* that incorporated the results of the investigation of off-site ditches.
- Continue work on resolving comments from the USEPA on the *Draft Feasibility Study* report.

B. Other information related to the progress of work:

- None during this reporting period.

3. Project Schedule

A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100%

complete and have been collapsed for presentation brevity on Figure 1. With the submittal to the USEPA of the revised draft RI report and the draft FS report, the schedule is controlled by the USEPA review process. Coordination with the USEPA is ongoing regarding the review process. The schedule was updated with the August 2012 progress report to provide an additional approximately two months following the September 11, 2012 meeting, to conclude the review process. As the time necessary to complete the review process is further defined, the schedule will be updated accordingly.

B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:

- No specific delays are being encountered at this time, and the current schedule reflects the completion of draft RI and FS reports, as described above. However, resolution of comments is pending on the revised RI and draft FS.

C. Description of efforts made to mitigate these delays or anticipated delays:

- None necessary at this time.

4. Funding Mechanism

A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact David McNichol of IES at 973-628-3355.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC



Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: S. Miller, NJDHSS
F. Cardiello, Esq., USEPA
D. McNichol, IES
D. Toft, Esq.
A. Pavelka, NJDEP
R. Lampkin, Ashland

C. McGowan, IES
S. MacMillin, Brown and Caldwell
K. Tolson, Geosyntec
M. DeFlaun, Geosyntec
J. Kubitz, Entrix

Figure 1
RI/FS PROJECT SCHEDULE
LCP Chemicals, Inc. Superfund Site

